



WASHINGTON STATE DEPARTMENT OF
Natural Resources

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DOUG SUTHERLAND
Commissioner of Public Lands

RECEIPT DATE:

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March 18, 2002

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COMMUNICATIONS KC-7
PO BOX 12999
PORTLAND OR 97211

Re: McNary-John Day Transmission Line Project, Draft Environmental Impact Statement **TNP-TTP 3**

The Washington Natural Heritage Program has reviewed the draft EIS for the McNary-John Day Transmission Line Project, and we have found serious deficiencies in the Special Status Plants portion of the document (pages 3-40 and 3-41).

- 1) The July survey time is inappropriate for ALL of the potential species in the project area. Northern wormwood is identifiable in late April and early May. Ute ladies' tresses is identifiable in late July through September, but one July survey is not enough to rule out the possibility of the presence of the species (see Section 7 guidelines for Ute ladies' tresses). All of the state sensitive species are identifiable from late April through early June at the latest. In other words, none of these special-status plants would be found during a July survey, so asserting that "neither species was found during field surveys" is not biologically significant. For more information on flowering times, see our website at <http://www.wa.gov/dnr/htdocs/fr/nhp/wanhp.html>.
- 2) We do not identify "potential habitat" for state sensitive species. We do identify known populations, and it appears that there are known populations in our database of both Pauper's milkvetch and Snake River cryptantha from the project corridor. The language used is misleading and inaccurate.
- 3) *Lomatium laevigatum* (smooth desert parsley) also occurs within ¼ mile of the transmission line corridor, and was not included in the surveys.
- 4) There is insufficient discussion of methods in this section. Was the entire project area surveyed, or just the areas with potential for the species above? On what specific days in July did surveys take place? Survey dates are significant for rare plant surveys. Did a qualified botanist conduct the survey? Was a full species list compiled?

This portion of the Columbia River is one of the most diverse areas in the state, with a high potential for rare plant populations. Our recommendation would be to reject the findings for special-status plants altogether, and to require another survey, with, at a minimum, the following methodology:

- a) the development of a thorough list of potential species,
- b) surveys undertaken by qualified botanists with experience in eastern Washington rare plant surveys,
- c) Section 7 guidelines for Ute ladies' tresses followed properly,

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- d) surveys undertaken at the proper time of the season for each potential rare plant species , which may require more than one survey in selected sections of the project area,
- e) surveys completed for all portions of the project area that still support native vegetation,
- f) a full species list compiled for the project area,
- g) a full description of survey methodology included in the final EIS.

Thank you very much.

Sincerely,



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